

To: Jackson, Ryan[jackson.ryan@epa.gov]
From: Liebowitz, Daniel
Sent: Thur 6/1/2017 1:33:05 PM
Subject: Impact of Delays for New Chemical Substance Registrations

Hello Mr. Jackson,

We spoke over the phone a few weeks ago regarding the impact of delays related to the EPA PMN review process under the revised TSCA regulations. You requested information regarding the value of each PMN in annual sales for our business. It is difficult to provide an accurate value for annual sales as these are all new products to the coatings market. However a rough estimate would be in the \$300,000-\$500,000/year range for all 13 delayed PMNs assessed under the revised regulations. The biggest impact of these delays is the delay in availability of these new products for customer evaluations and the uncertainty of whether they will be successfully registered. In one case that has been under review for over 1-year, the primary customer for this new product has indicated that during this 1-year delayed review period, they have developed another technical solution and may not need to purchase this product. In addition to the impact of the delays in the review process, another concern is the assessment of uses that some of our products were not designed for and were never intended.

Regards,

Dan

Daniel Liebowitz

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